



COMMUNITY DEVELOPMENT SERVICES

ENVIRONMENTAL MANAGEMENT DEPARTMENT

<http://www.edcgov.us/EMD/>

PLACERVILLE OFFICE:

2850 Fairlane Court
Placerville, CA 95667
(530) 621-5300
(530) 642-1531 Fax

LAKE TAHOE OFFICE:

924 B Emerald Bay Rd.
South Lake Tahoe, CA 96150
(530) 573-3450
(530) 542-3364 Fax

September 20, 2017

Echo Road Group Water Association
Tom Belt, Secretary/Treasurer
P.O. Box 423
Aguanga, CA 92536

**RE: ECHO ROAD GROUP WATER ASSOCIATION (PWS NO. 0900525)
CITATION NO. 01_39_17C_006_0900525_22**

Enclosed is the County of El Dorado, Environmental Management Local Primacy Agency Citation No. 01_39_17C_006_0900525_22 issued to Echo Road Group Water Association. Please note there are certain deadlines associated with this Citation.

Any person who is aggrieved by a citation issued by the El Dorado County LPA may file a petition with the State Water Resources Control Board (State Water Board) for reconsideration of the citation. Petitions must be received by the State Water Board within 30 calendar days of the issuance of the citation. The date of issuance is the date when the El Dorado County LPA mails or serves a copy of the citation, whichever occurs first. If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day. Petitions must be received by 5:00 p.m. Information regarding filing petitions may be found at:

http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml

If you have any questions, please contact Jeffrey Warren at (530) 621-7628 or by email jeffrey.warren@edcgov.us, or Karen Bender at (530) 573-3453 or by email karen.bender@edcgov.us.

Sincerely,

Jeffrey Warren, REHS
Environmental Health Program Manager

Cc: Ali Rezvani, PE
Enc.

Citation No. 01_39_17C_006_0900525_22

Issued: September 20, 2017

EL DORADO COUNTY
COMMUNITY DEVELOPMENT SERVICES
ENVIRONMENTAL MANAGEMENT DEPARTMENT

IN RE: Echo Road Group Water Association
Water System No. - 0900525

ATTN: Tom Belt, Secretary/Treasurer
P.O. Box 423
Aguanga, CA 92536

CITATION NO. 01_39_17C_006_0900525_22

**VIOLATION OF MAXIMUM CONTAMINANT LEVELS
FOR TOTAL COLIFORM BACTERIA**

TITLE 22, CALIFORNIA CODE OF REGULATIONS, SECTION i.e. 64426.1(b)(2)

ISSUED ON September 20, 2017

Section 116650 of the California Health and Safety Code (hereinafter "CHSC") authorizes the issuance of a citation to a public water system for failure to comply with a requirement of the California Safe Drinking Water Act, California Health and Safety Code, Division 104, Part 12, Chapter 4, commencing with Section 116270 (hereinafter "California SDWA"), or any regulation, standard, permit or order issued or adopted thereunder.

The County of El Dorado Community Development Services, Environmental Management Department (hereinafter "Department"), hereby issues a citation to the Echo Road Group Water Association (mailing address: PO Box 423, Aguanga, CA

92536) (hereinafter "Water System") for violation of Title 22 of the California Code of Regulations ("CCR"), Section i.e. 64426.1(b)(2).

APPLICABLE AUTHORITIES

CHSC, Division 104, Part 12, Chapter 4, Article 1, Section 116271 (k)(2) states:

(k)(2) The deputy director is delegated the State Water Resources Control Board's authority to provide notice, approve notice content, approve emergency notification plans, and take other action pursuant to Article 5 (commencing with Section 116450), to issue, renew, reissue, revise, amend, or deny any public water system permits pursuant to Article 7 (commencing with Section 116525), to suspend or revoke any public water system permit pursuant to Article 8 (commencing with Section 116625) and to issue citations, assess penalties, or issue orders pursuant to Article 9 (commencing with Section 116650).

CHSC, Division 104, Part 12, Chapter 4, Article 1, Section 116275 (b) & (ab) states:

(b) "Department" means the state board.

(ab) "State board" means the State Water Resources Control Board.

CHSC Division 104, Part 12, Chapter 4, Article 9, Section 116650 states:

(a) If the department determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the department may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of

1 receipt of the certified mail. If a person to whom a citation is directed refuses to accept
2 delivery of the certified mail, the date of service shall be deemed to be the date of
3 mailing.

4 (b) Each citation shall be in writing and shall describe the nature of the violation
5 or violations, including a reference to the statutory provision, standard, order, citation,
6 permit, or regulation alleged to have been violated.

7 (c) A citation may specify a date for elimination or correction of the condition
8 constituting the violation.

9 (d) A citation may include the assessment of a penalty as specified in
10 subdivision (e).

11 (e) The department may assess a penalty in an amount not to exceed one
12 thousand dollars (\$1,000) per day for each day that a violation occurred, and for each
13 day that a violation continues to occur. A separate penalty may be assessed for each
14 violation.

15
16 **Local Primacy Delegation Agreement, Section 1.02.** The Department hereby
17 delegates to the County all authority granted to it under the California Safe Drinking
18 Water Act (CHSC 116270) for regulation of small public water systems.

19
20 **Title 22, California Code of Regulations, Section 64423 (a)(3) and (c) states:**

21 (a) Each water supplier shall collect routine bacteriological water samples
22 follows:

23 (3) The minimum number of samples for transient-noncommunity water
24 systems using groundwater and serving 1000 or fewer persons a month
25 shall be one in each calendar quarter during which the system provides
26 water to the public.

27 (c) If any routine, repeat, or replacement sample is total coliform-positive, then
28

1 The water supplier shall collect repeat samples in accordance with Section
2 64424 and comply with the reporting requirements specified in Sections
3 664426 and 64426.1.

4
5 **Title 22, California Code of Regulations, Section 64424 (a) through (d) states in**
6 **relevant part:**

7 (a) If a routine sample is total coliform-positive, the water supplier shall collect a
8 repeat sample set as described in paragraph (1) within 24 hours of being
9 notified of the positive result. The repeat samples shall all be collected within
10 the same 24 hour time period. A single service connection system may request
11 that the State Board Allow the collection of the repeat sample set over a four-
12 day period.

13
14 (b) When collecting the repeat sample set, the water supplier shall collect at least
15 one repeat sample from the sampling tap where the original total coliform-
16 positive sample was taken. Other repeat samples shall be collected within five
17 service connections upstream or downstream of the original site. At least one
18 sample shall be from upstream and one from downstream unless there is no
19 upstream and/or downstream service connection.

20 (c) If one or more samples in the repeat sample set if total coliform-positive, the
21 water supplier shall collect and have analyzed an additional set of repeat
22 samples as specified in subsections (a) and (b). The supplier shall repeat this
23 process until either no coliforms are detected in one complete repeat sample or
24 the supplier determines that the MCL for total coliforms specified in Section
25 64426.1 has been exceeded and notifies the State Board.

26 (d) If a public water system for which fewer than five routine samples/month are
27 collected has one or more total coliform-positive samples, the water supplier
28 shall collect at least five routine samples the following month. If the supplier

1 stops supplying water during the month after the total coliform-positive(s), at
2 least five samples shall be collected during the first month the system resumes
3 operation. A water supplier may request the State Board waive the requirement
4 to collect at least five routine samples the following month, but a waiver will not
5 be granted solely on the basis that all repeat samples are total coliform-
6 negative.

7
8 **Title 22, California Code of Regulations, Section 64426.1 (a) through (c) states in**
9 **relevant part:**

10 (a) Results of all samples collected in a calendar month pursuant to Sections
11 64423, 64424, and 64425 that are not invalidated by the State Board or the
12 laboratory shall be included in determining compliance with the total coliform
13 MCL. Special purpose samples such as those listed in section 64421(b) and
14 samples collected by the water supplier during special investigations shall not
15 be used to determine compliance with the total coliform MCL.

16
17 (b) A public water system is in violation of the total coliform MCL when any of the
18 following occurs:

19 (1) For a public water system which collects at least 40 samples per month,
20 more than 5.0 percent of the samples collected during any month are
21 total coliform-positive; or

22 (2) For a public water system which collects fewer than 40 samples per
23 month, more than one sample collected during any month is total
24 coliform-positive; or

25 (3) Any repeat sample is fecal coliform-positive or E.coli-positive; or

26 (4) Any repeat sample following a fecal coliform-positive or E.coli-positive
27 routine sample is total coliform-positive.
28

(c) If a public water system is not in compliance with paragraphs (b)(1) through (4), during any month in which it supplies water to the public, the water supplier shall notify the State Board by the end of the business day on which this is determined, unless the determination occurs after the State Board office is closed, in which case the supplier shall also notify the State Board within 24 hours of the determination. The water supplier shall also notify the consumers served by the water system. A Tier 2 Public Notice shall be given for violations of paragraph (b)(1) or (2), pursuant to section 64463.4. A Tier 1 Public Notice shall be given for violations of paragraph (b)(3) or (4), pursuant to section 64463.1.

STATEMENT OF FACTS

The Water System is operated under Water Supply Permit No. 0900525, issued on June 30, 2016.

The Water System is a transient-noncommunity water system serving untreated groundwater to 20 seasonal cabins typically during the months of May through October. The Water System source of supply is a spring on the south side of Lower Echo Lake. It is considered a groundwater source.

Title 22, CCR, Section 64423(a)(3) specifies that a transient-noncommunity water system using groundwater and serving 1,000 or fewer persons a month shall collect a minimum of one routine bacteriological sample in each calendar quarter during which the system provides water to the public for analysis of total coliform content to determine compliance with the maximum contaminant level (MCL) for total and fecal coliform bacteria.

Issued: **September 20, 2017**

1 A routine sample collected on August 1, 2017 tested positive for total coliform bacteria,
2 and two out of four repeat samples collected on August 3, 2017 tested positive for total
3 coliform bacteria. All samples tested negative for E.coli.

4
5 The Water System was chlorinated and flushed starting August 4, 2017. Two
6 additional samples taken August 7, 2017 were negative for coliform and E.coli
7 bacteria.

8 Public notification was provided to the Water System users on August 4, 2017. The
9 Department received the Certification of Completion of Public Notification form dated
10 August 29, 2017. The Water System also completed the required Level 1 assessment
11 which was dated August 29, 2017 and was received and reviewed by the Department
12 on September 5, 2017.

13 **DETERMINATION**

14
15 Based on the above, the Department has determined that the Water System violated
16 Title 22 CCR Section 64426.1(b)(2) which specifies that a public water system is in
17 violation of the total coliform MCL if more than one sample collected during any month
18 is total coliform-positive. The results of the sample analysis for the Water System
19 indicated that more than one sample collected during the month of August 2017 was
20 total coliform positive.
21

22 **DIRECTIVES**

23
24 The Water System is hereby directed to take the following actions:

- 25 1. Comply with Title 22 CCR Section 64426.1 in all future monitoring periods.
- 26 2. Within thirty (30) days of the issuance of this Citation, notify all persons served
27 by the Water System of the total coliform MCL violation in conformance with
28

1 Title 22 CCR Sections 64426.1(c) and 64463.4. **Completed: The water**
2 **operator provided public notification August 4, 2017.**

3 3. In accordance with Title 22 CCR Section 64426(b)(2) and the Federal Revised
4 Total Coliform Rule, conduct and submit a Level 1 assessment (Attachment A)
5 by September 4, 2017. **Completed: The water operator completed the**
6 **assessment August 29, 2017.**

7 4. Complete and return Attachment B "Certification of Completion of Public
8 Notification" form to the Department within ten (10) days of completion of the
9 public notification. **Completed: The water operator provided the**
10 **certification form dated August 29, 2017 to the Department .**

11 5. Within thirty (30) days of receipt of this Citation, the Water System shall submit
12 a written response to the Department indicating its willingness to comply with
13 directives of this Citation.
14

15 The Department reserves the right to make such modifications to this Citation as it
16 may deem necessary to protect public health and safety. Such modifications may be
17 issued as amendments to this Citation, and shall be deemed effective upon issuance.

18 Nothing in this Citation relieves Water System of its obligation to meet the
19 requirements of the California SDWA, or of any regulation, permit, standard, or order
20 issued or adopted thereunder.
21

22 All submittals required by this Citation shall be submitted to the Department at the
23 following address:
24

25 Jeffrey Warren, REHS
26 Environmental Management Programs Manager
27 El Dorado County
28 Community Development Services
Environmental Management Department
2850 Fairlane Court, Bldg C

Citation No. **01_39_17C_006_0900525_22**

Issued: **September 20, 2017**

Placerville, CA 95667
(530) 621-7628

PARTIES BOUND

This Citation shall apply to and be binding upon the Echo Road Group Water Association, its officers, directors, shareholders, agents, employees, contractors, successors, and assignees.

SEVERABILITY

The directives of this Citation are severable, and the Water System shall comply with each and every provision thereof, notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Department to: issue citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any permit, regulation, permit or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Department to take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to comply with an order of the Department; and to petition the Superior Court to take various enforcement measures against a public water system that has failed to comply with or violates an order of the Department. The Department does not waive any further enforcement action by issuance of this citation.

Citation No. 01_39_17C_006_0900525_22

Issued: September 20, 2017

9/20/17
Date


Jeffrey Warren, REHS
Environmental Management Programs
Manager
El Dorado County
Community Development Services
Environmental Management Department

Attachments:

- A. Level 1 Assessment Form, completed
- B. Certification of Completion of Public Notification, completed

cc: Ali R. Rezvani, P.E.
Sacramento District Engineer
Division of Drinking Water
State Water Resources Control Board

K. Bender - reviewed & approved 9/5/17

REVISED TOTAL COLIFORM RULE (RTCR) – LEVEL 1 ASSESSMENT For Transient, Non-Community Water Systems

This form is intended to assist public water systems in completing the investigation required by the federal revised Total Coliform Rule (RTCR) [effective April 1, 2016] and may be modified to take into account conditions unique to the water system. To avoid a violation, an assessment report must be completed and returned to your local regulatory agency no later than 30 days after the coliform treatment trigger date.



SYSTEM NAME: Echo Road Group Water Assn. Trigger Date: 8/2/2017
Investigation Date: 8/4/2017

#	Issues	Yes/No	N/A	Potentially	If Yes or Potentially, Identify
1	Unusual occurrences with the water system since the last negative routine bacteriological sample:				
	Loss of pressure <5 psi	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
	Heavy precipitation and/or flooding	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Customer complaints of water quality or pressure	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Evidence of unauthorized access/vandalism	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Interruption in disinfection treatment	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
2	Changes to water system since last negative routine bacteriological sample:				
	Piping modified or repaired	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	System components replaced or repaired	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Changes in operational procedures or personnel	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
3	Groundwater source contamination:				
	Repeat bacteriological sample(s) from raw source water is positive for total coliform	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	<input type="checkbox"/>		Proceed to section 4 if groundwater is not used.
	Wells:				
	Cracks or holes in the well casing above grade	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
	Water can leak through well top seal	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
	The well is not equipped with a downturned screened vent.	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Water can leak through well head penetrations for electrical or sounding equipment	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Leaking pipes or standing water around the well(s)	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Springs and/or Horizontal Wells:				
	The collection site is overgrown with vegetation.	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Flowing/standing water around the collection site	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Evidence of animal activity around the collection site (grazing/burrowing)	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
	Rodents, insects or roots in the spring box	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	<input type="checkbox"/>		

COUNTY OF EL DORADO
RECEIVED

SEP 05 2017

ENVIRONMENTAL MANAGEMENT
SOUTH LAKE TAHOE

REVISED TOTAL COLIFORM RULE (RTCR) – LEVEL 1 ASSESSMENT

For Transient, Non-Community Water Systems

Page 2 of 3

#	Issues	Yes/No	N/A	Potentially	If Yes or Potentially, Identify
4	Surface water or GWUDI treatment issues		<input checked="" type="checkbox"/>		
	CT not met at all times	Y <input type="checkbox"/> N <input type="checkbox"/>		<input type="checkbox"/>	
	Spikes in raw or filtered water turbidity	Y <input type="checkbox"/> N <input type="checkbox"/>		<input type="checkbox"/>	
	Alarms and auto shutdowns are not properly set or functioning.	Y <input type="checkbox"/> N <input type="checkbox"/>			
5	Tank(s) storage, clearwell, backwash return:		<input type="checkbox"/>		Proceed to section 6 if there are no tanks.
	Openings in tank roof that rain water can enter	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
	Rodents, birds, insects or other unexpected materials inside tank	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Tank air vents are not properly screened to prevent insects from entering.	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Hatches or access ladders left unlocked	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	For redwood tanks, signs of birds/animals burrowing or nesting into the tank	Y <input type="checkbox"/> N <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	root intrusion, for underground tanks	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	<input type="checkbox"/>		
6	Distribution system				
	Low pressure transmission lines	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Dead end lines	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Interties with non-potable water systems or sources (even if valved off)	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	
	Any certified backflow prevention devices not tested in the previous calendar year.	Y <input type="checkbox"/> N <input type="checkbox"/>	<input checked="" type="checkbox"/>		
7	Sample site and sampling procedures				
	Is there a written sampling procedure and was it followed?	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>		<input type="checkbox"/>	
	Sample sites are not the ones identified in the approved bacteriological sample siting plan.	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Sample taps are wet, leaking or dirty	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	The sample collector was not properly trained	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
	Were sample bottles delivered to the lab in a cooler and within allowable holding time?	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>		<input type="checkbox"/>	
	Is there a seasonal pattern in positive samples when reviewing historical monitoring?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>			
8	Other	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>		<input type="checkbox"/>	

SWRCB – DIVISION OF DRINKING WATER

MAY 2016

REVISED TOTAL COLIFORM RULE (RTCR) – LEVEL 1 ASSESSMENT

For Transient, Non-Community Water Systems

Page 3 of 3

SUMMARY: Based on the results of your assessment and any other available information, what deficiencies do you believe to have caused the positive total coliform sample(s) within your distribution system? (DO NOT LEAVE BLANK)

Deficiency #	Deficiency Description
1.	Possible Contamination of Sample Site Valve
2.	
3.	
4.	
5.	

CORRECTIVE ACTIONS: What actions have you taken to correct the above mentioned deficiencies? If additional time is needed to correct a deficiency, indicate the date that it will be corrected. (DO NOT LEAVE BLANK)

Deficiency #	Corrective Action	Date Completed
1.	System chlorinated and flushed	8/4/2017
2.		
3.		
4.		
5.		

CERTIFICATION: I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

NAME: Thomas Belt

TITLE: Secretary/Treasurer DATE: 8/29/17

Upon review of the Level 1 Assessment Form, the local regulatory agency may require submittal of the following additional information:

- Sketch of system showing all sources, all treatment and chlorination locations, storage tanks, microbiological sampling sites and general layout of the distribution system including the location of all hazardous connections such as the wastewater treatment facility.
- A set of photographs of the source, pressure tanks, and storage tanks in the system may be submitted if they would show that the contamination is directly related and changes have been made since the last inspection by the local regulatory agency.
- Name, certification level and certificate number of the Operator in Responsible Charge.
- Copy of the last cross connection survey performed that identifies the location of all unprotected cross connections.

K Bender
9/5/17

CERTIFICATION OF COMPLETION OF PUBLIC NOTIFICATION

This form when completed and returned to the County of El Dorado, Environmental Management Division, Community Development Agency serves as certification that public notification to water users was completed as required by the State Water Resources Control Board (as required per Title 22 of the California Code of Regulations). Failure to do so may result in additional hourly time charges to your water utility and may result in a formal enforcement action with monetary penalties.

Public Water System Name Echo Road Group Water Assoc.

Public Water System Number _____

Public notification for the (Month/Year) (bacteriological monitoring failure/MCL failure) was performed by the following method(s):

Check and complete all that apply:

- A) ☒ By posting of the approved notice in conspicuous locations served by the water system.
- B) ☒ Distributing notice by using one or more of the following methods to reach persons not likely to be reached by public posting: Email message or direct delivery.
- C) ☐ Publication in a local newspaper.
- D) ☐ Posting on the internet.

Provide the date (or dates) that the notice was posted/distributed 8/4/17

I hereby certify that the above information is factual.

Thomas G. Belt
Printed Name

T. G. Belt
Signature

8/29/17
Date

Return form to: County of El Dorado, Community Development Agency
Environmental Management Division
2850 Fairlane Court, Building "C", Placerville, CA 95667
FAX 530-642-1531

Or in So. Lake Tahoe: 924 B Emerald Bay Rd, South Lake Tahoe, CA 96150
FAX 530-542-3364

COUNTY OF EL DORADO
RECEIVED

SEP 05 2017

ENVIRONMENTAL MANAGEMENT
SOUTH LAKE TAHOE